

MARIO N. ALIOTO, ESQ. (56433)  
JOSEPH M. PATANE, ESQ. (72202)  
LAUREN C. CAPURRO, ESQ. (241151)  
TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP  
2280 Union Street  
San Francisco, CA 94123  
Telephone: (415) 563-7200  
Facsimile: (415) 346-0679  
E-mail: [malioto@tntp.com](mailto:malioto@tntp.com)  
[jpatane@tntp.com](mailto:jpatane@tntp.com)  
[lauren russell@tntp.com](mailto:lauren russell@tntp.com)

*Class Counsel for the Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC

MDL No. 1917

This Document Relates to:

*All Indirect Purchaser Actions.*

**DECLARATION OF LAUREN C.  
CAPURRO IN SUPPORT  
PLAINTIFFS' ADMINISTRATIVE  
MOTION PURSUANT TO L.R. 7-11  
FOR LEAVE FOR EXCESS PAGES**

Judge: Hon. Samuel Conti

1 I, Lauren C. Capurro, declare as follows:

2 1. I am an attorney duly licensed by the State of California and am admitted to practice  
3 before this Court. I am an associate with the law firm Trump, Alioto, Trump & Prescott, LLP and my  
4 firm serves as Class Counsel for the Indirect Purchaser Plaintiffs ("Plaintiffs") in the above-captioned  
5 action. I submit this declaration in support of Plaintiffs' Administrative Motion Pursuant to L.R. 7-11  
6 For Leave For Excess Pages ("Administrative Motion"). I have personal knowledge of the facts stated  
7 herein, and I could and would competently testify thereto if called as a witness.

8 2. Plaintiffs are moving for preliminary approval of class action settlements with five  
9 defendant groups – Philips, Panasonic, Hitachi, Toshiba and Samsung ("Settling Defendants").  
10 Plaintiffs have been litigating against Settling Defendants for more than seven years.

11 3. Plaintiffs' motion for preliminary approval describes the procedural history, the  
12 settlement terms and negotiations with each of the five Settling Defendants, the sufficiency of  
13 discovery, the summary judgment motions and the parties' preparations for trial. Plaintiffs also set  
14 forth a comprehensive notice program and a detailed plan of distribution for the Court's evaluation and  
15 approval.

16 4. Attached hereto as Exhibit 1 is a true and correct copy of the email I sent to counsel for  
17 the Settling Defendants on May 27, 2015. In the email I asked them to let me know if they had any  
18 objection to Plaintiffs filing this Administrative Motion to request leave to file a thirty (30) page brief.  
19 Counsel for Philips, Panasonic and Hitachi have informed me they have no objection. I have not heard  
20 from counsel for Samsung SDI or Toshiba.

21  
22 I declare under penalty of perjury under the laws of the United States of America that the  
23 foregoing is true and correct. Executed on May 28, 2015, in San Francisco, California.

24  
25 /s/ Lauren C. Capurro  
26 Lauren C. Capurro  
27  
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